REMARKS

This is in response to the Office Action mailed March 17, 2009. For at least the reasons stated below, Applicants submit that all pending claims are in condition for allowance.

Claims 25-28, 30, 33, 37 and 46-50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,925,442 to Shapira et al. ("Shapira") in view of U.S. Patent No. 6,850,896 ("Kelman"). For at least the reasons noted below, Applicants submit the rejection is improper as the combination of Shapira and Kelman fails to teach or suggest all of the claimed limitations.

By way of background, Applicants notes that the present prosecution has extended almost nine years since the original filing date of December 15, 2000. Applicants have interviewed this application, in person, with SPE Gart and Examiner Frenel to advance the prosecution. In response to the in-person interview, various non-final actions have been mailed, where, as noted below, the prior art still fails to address the present claims.

In the previous office action, all claims were rejected as being fully anticipated by Shapira. Without any amendments, that rejection is converted to a 103(a) rejection, where the Examiner states that two of the method steps are not included in Shapira. Prior to the previous office action, Shapira was a tertiary reference in a three-reference 103(a) rejection. Therefore, as best understood, Shapira, has been asserted as a tertiary reference, then a sole anticipatory reference and now a lead obviousness reference.

Applicants merely seek to advance the present prosecution as expeditiously as possible, but remain confused as to the application of the asserted prior art, which fails to

even address the recited limitations. Clearly, based on the extensive prosecution and numerous opportunities for presenting prior art, the failure to present any applicable anticipatory or obviousness rejection indicates that the pending claims are allowable and recite allowable subject matter.

Shapira, as understood, constructs profiles that define products or services a business owner wants to sell and assigns each profile a value (Shapira, column 2, lines 26-29). Software analyzes a web site's log files (which track every exchange of traffic data between the web site and other computers over the Internet) and matches visitors with both an advertising campaign and a profile (Shapira, column 2, lines 29-32). The software sums the value for each visitor matched with an advertising campaign according to the profiles with which the visitor is matched (Shapira, column 2, lines 33-35). This allows an Internet business owner a way to track the value of visitors who visit the web site (Shapira, column 2, lines 36-39). An Internet business is able to calculate the return on investment for each advertising campaign the business owner is currently running (Shapira, column 2, lines 40-43).

To overcome the Examiner-admitted deficiencies of Shapira ("Shapira does not explicitly disclose analyzing the web page to detect a context for the webpage using a statistical analysis of the web page content; selecting at least one file representing at least one product related to the detected context." – Page 4, lines 5-7 of Office Action), the Examiner asserts Kelman.

Kelman, as understood, is a relational database software application that provides a user interface to **manage sales data**. The Kelman system "assists in classification, review and approval of data to be stored in the database for the use of a product supplier

or seller." The Kelman system is a data aggregation and management system that allows for parties to classify and manage various levels of product data, where there is a high degree of specificity to the product data, such as different versions or minor adjustments between competing products. Kelman is focused on using a database management system to provide data mining and interaction.

The limited usage web-based transactions in the Kelman system is noted on col. 4, lines 29-31 and col. 6, lines 60-67. Col. 4 provides for data collection via a "World Wide Web" site. Col. 6, lines 60-67 provides for a salesperson to access the data using "a web browser." To quote Kelman: "Using a World Wide Web ("Web") browser, salespersons can use the sales effectiveness application to: compare products through dynamic competitive scorecards…"

By contrast, claim 46 claims the step of "analyzing the web page to detect a context for the web page." Kelman is absolutely silent regarding "analyzing the web page." There is no analysis of a web page in Kelman. The processing computations of Kelman relate to database operations and the limited utilization of a "web page" in Kelman is to use the browser as the application portal to get to the database. In other words, under the Kelman system, the web page would be the database access portal page and there would be absolutely no need or desire to analyze that page to detect a context. Among other reasons, there is no reason for a "context" of a database interface page.

Applicants assert further confusion regarding the assertion that col. 8, lines 54-67 of Kelman teaches or suggests the claimed selecting at least one file representing at least one product related to the detected context. First off, as noted above, there is no "context" to be detected under the Kelman system. Secondly, the cited passage of col. 8,

lines 54-67 describes a "value chain" relating to corresponding information or associated information. The relation of the Kelman values correspond to the matrix and the information that is associated with the value chain is related information, failing to teach or suggest anything associated with the claimed "at least one file" being selected.

Kelman is completely inapplicable to the claimed invention. Shapira is and has been repeatedly shown to not be a valid prior art reference in supporting a rejection of the pending claims.

On Page 4 of the present Office Action, the Examiner provides a stated motivation for combining these disparate references, to which Applicants respectfully disagree. The Examiner states that the "[a]utomatic generation of simple web pages, sales proposals, or presentations based on a customer's specific situation exists in some products," to which Applicants assert confusion. It is asserted that it would have been obvious to combine these to provide generic marketing literature, which is has no bearing or applicability to the claims. Even if one skilled in the art were so inclined to combine Shapira with Kelman, the combination would fail to teach or suggest, among other things, "analyzing the web page to detect a context." Kelman does not perform web page analysis and the limited web page of Kelman is the database interface, hence there is no need or any processing to be done with a "context" of this interface page.

Accordingly, it is respectfully submitted that independent claim 46 is allowable over Shapira. Because claims 25 through 28, 30, 33, 37 and 47-48 depend from independent claim 46, and therefore include all the elements of claim 46, it is respectfully submitted that these claims are allowable for at least the same reasons. Additionally, independent claims 49 and 50 recite elements that are substantially similar to independent

claim 46. Thus, for at least the reasons discussed above with regards to independent

claim 46, it is respectfully submitted that independent claims 49 and 50 are also

allowable.

For at least all of the above reasons, Applicants respectfully request that the

Examiner withdraw all rejections, and allowance of all the pending claims is respectfully

solicited. To expedite prosecution of this application to allowance, the Examiner is

invited to call the Applicants' undersigned representative to discuss any issues relating to

this application.

Respectfully submitted,

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